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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001
Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0372
Comment submitted by D. Hubbard

Submitter Information

General Comment

As a supporter of family farms within the New York's Chesapeake Bay watershed area, I urge the Environmental Protection Agency (EPA) to revise New York's Chesapeake Bay Total Maximum Daily Load (TMDL) allocation to a realistic and attainable standard and accept the NYS Department of Environmental Conservation's (NYS DEC) Watershed Implementation Plan (WIP) which is an aggressive and realistic plan to protect water quality in New York's portion of the Bay watershed.

Clean water is a priority of New York farmers, who have worked for many years to protect the state's water resources under the most progressive water quality standards in the country. The EPA should revise New York's Chesapeake Bay TMDL allocation to more adequately reflect NY's environmental achievements, be more proportionate in accordance with science, account for NY's decreasing environmental footprint over the past decade and reflect that NY's water quality chemistry already meets Bay specifications for high water quality as required by EPA's TMDL. New York's state-wide environmental program achievements, as well as its unique landscape, growing conditions and seasonality - which differ from other five Bay watershed states - should all be accounted for in any Chesapeake Bay Program TMDL.

EPA should also adopt the model refinements recommended by the NYS DEC in their draft Phase I WIP which is an aggressive, achievable, stakeholder driven plan which provides adequate assurances of NY's ability to achieve stated nutrient reductions. These requested model refinements reflect the environmental protection accomplishments NYS has already attained and truthfully represents the practices of environmental stewardship currently employed on New York's family farms.

For these reasons, please revise New York's Chesapeake Bay Total Maximum Daily Load (TMDL) allocation to a realistic and adopt the model refinements recommended by NYS DEC's WIP.

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